

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

United States Courts Southern

for the

District of Texas

Southern District of Texas

FILED

December 28, 2021

United States of America

v.

Nathan Ochsner, Clerk of Court

Karime Isabel PEREZ (1999/US)

Case No. **M-21-2662-M***Defendant(s)*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 28, 2021 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

18 USC § 922(a)(6)

It shall be unlawful for any person in connection with the acquisition or attempted acquisition of any firearm or ammunition from a licensed importer, licensed manufacturer, licensed dealer, or licensed collector, knowingly to make any false or fictitious oral or written statement or to furnish or exhibit any false, fictitious, or misrepresented identification, intended or likely to deceive such importer, manufacturer, dealer, or collector with respect to any fact material to the lawfulness of the sale or other disposition of such firearm or ammunition under the provisions of this chapter.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

Complaint authorized by: AUSA Sarina Dipiazza

Submitted by reliable electronic means, sworn to
 and attested to telephonically per Fed. R. Cr. 4.1,
 and probable cause found on:

Date: 12/28/2021 9:48 PMCity and state: McAllen, Texas/s/ Aaron Valadez*Complainant's signature*Aaron Valadez, ATF Special Agent*Printed name and title*

*Judge's signature*Nadia S. Medrano, U.S. Magistrate Judge*Printed name and title*

Attachment "A"

This affidavit is in support of a criminal complaint charging Karime Isabel PEREZ, hereinafter referred to as "PEREZ", with the criminal violation set forth in Attachment A. The evidence available to me demonstrates that there is probable cause that PEREZ violated Title 18 U.S.C. Section 922(a)(6).

The Affiant states as follows:

On December 28, 2021, ATF was conducting surveillance at a local Federal Firearms Licensee (FFL) located in McAllen, TX. While at the location, agents observed a black Chevrolet Silverado bearing Texas license plate "PJR2613" pull into the business parking lot. After the aforesaid vehicle parked, agents saw a female subject, later identified as PEREZ, exit the vehicle's front passenger seat and walk into the FFL; agents then watched as PEREZ subsequently exited the FFL carrying one rifle box and place it in the back seat area of same Chevrolet Silverado in which she came and then get into the front passenger seat. As the vehicle began leaving the business, agents conducted covert mobile surveillance on PEREZ and the then unidentified driver.

Agents then requested a Texas State Trooper to conduct a traffic stop on the vehicle; the vehicle was pulled over for "Speeding Over Limit (#)(TXTRC 545.351; 545.352)" and "Transparent material on Windshield/Side/Rear Window Alters Color/Reduces Light Transmission - Tint (TXTRC 547.613(A)(2)) 19." At no time did agents lose eyesight of the vehicle from the time it left the FFL to the time of the traffic stop, which occurred approximately 10 minutes after departure.

During the traffic stop, agents approached the vehicle and made contact with passenger PEREZ and also identified the driver as Ivan Delgado-Hernandez. Agents noticed that the same rifle box that was placed in the back seat area by PEREZ in the FFL business parking lot was presently sitting in the back passenger floorboard of the vehicle. Agents recovered the box and inside located a Century Arms, model VSKA, 7.62x39 mm caliber rifle with SN: SV709545. Agents decided to interview PEREZ concerning the firearm purchase.

During this Post-Miranda interview, PEREZ admitted that she purchased the AK-47 variant rifle on behalf of the Delgado-Hernandez. Specifically, PEREZ admitted to lying on question 21(a) of the ATF Form 4473 when she checked the box indicating that she was the actual buyer of the firearm when she knew the Century Arms, model VSKA, 7.62x39 mm caliber rifle with SN: SV7095451 she purchased on December 28, 2021, was for Delgado-Hernandez.